

BECKER DRIVER TRAINING FACILITY
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QA17966

July 20, 1993

National Highway Traffic Safety Administration
400 7th Street, S.W.
Washington, D.C. 20590
Gentlemen:

RE: Safety and Standards of
training for truck driver
programs

Our school is a heavy-duty truck driver training school, which was licensed by the Department of Public Safety, (State of Minnesota). The purpose of this letter is to draw attention to the need for change in the delivery of training methods for truck drivers. The standards set by the Department of Public Safety, (State of Minnesota), far surpass the standards set by the Department of Education; of which I am very involved in (the vocational education system), on one hand, and a business, (and training school), on the other. Our separate driver training school, has been through the intense requirements of the Department of Public Safety, and the standards set by this government department, are extremely stringent, and a credit to promoting national, as well as state highway safety. The basis for industry standards begin with your department.

The problem with the Department of Education, as a possible source of standards is that the Department of Education has it's own set of standards; ex: funding, etc. Additionally the Department of Education does not possess the EXPERTISE, we in the transportation industry have gained from years of doing the actual procedures of freight movement, etc. As a truck line, who use our own graduated students, we have witnessed the (need for change in the other schools graduated students), through the use of the Department of Educations methods of teaching. Any school that could use their own finished product, in the business world setting, would see the shortcomings in their methods of teaching. This system far surpasses any self-evaluation process that most schools currently rely upon.

Schools are not meeting the challenge of training qualified individuals for the transportation industry, and I will elaborate on a few problems our school in particular has been trying to overcome; this will shed light on situations, or reasons, why our industry and training schools should be kept separate from the Department of Education. The transportation industry will not have a chance in changing the educational system, in order to produce qualified drivers, therefore, we must establish our own industry standards/regulations, and have separate federal student aid established. This meaning, separate from the Federal Title IV.

Our school began training students through our separate company, Becker HI-Way Frate. Becker HI-Way Frate, is a general commodity common and contract carrier which operates in a 32 state area. We began training our own employees, when skilled drivers could not be found to meet the demand for positions available. Due to the success of our training, we started a separate driver training school. The events of our training school are related to the educational system, so I will elaborate on the difficulties our industry has to face in trying to conform to the educational field. The Department of Education refuses to admit they are inexperienced in our field, and therefore unqualified to regulate our type of school, but insist our type of training school must adhere to their generalized stereotyped classifications.

A school must be accredited by an accrediting agency, for it's student to be able to participate in the Federal Title IV programs, (student financial aid). The accrediting agencies, for non public schools charge huge amounts of money, under the guise of passing the standards of quality education. In reality, a report made by the Permanent Subcommittee on Investigations (of the Committee on Government Affairs)- United States Senate, entitled, "Abuses in Federal Student Aid Programs" (102nd

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Congress Senate report # 102-58), reported increases in revenue for these independent accrediting agencies, ranged from a low of 41% to a high of 590% for membership dues. this is one reason educational costs have skyrocketed. The insurance of quality education has become a price tag. Non public schools have two choices: increase tuition, while cutting the hours of training, or don't participate in Federal Title IV programs. Students attending non public schools, WITHOUT funding, can't afford to attend. These students are ineligible for low interest educational loans; without financial aid, students can't update skills, or learn a trade. They (students) either remain in a low-paying job, or resort to a public school, where federal Title IV programs are available, but the "Hands On" and industry techniques are lacking. ACCREDITED non public schools with huge accreditation membership to pay are more **interested in number** of students, not in quality education, in order to survive.

The Department of Education, requires schools to be accredited to obtain Title IV funding, for it's students. What isn't made known is the difference between the non public schools, and the public schools systems. Non public schools are literally forced to go through the seven independent accrediting agencies, which were mentioned in the Senate Report. Our school has repeatedly been told to go through the accrediting agencies, (which have been proven to be an inadequate source of insuring quality education). Mr. Williams, of the Accrediting Council of Continuing Education Training, voiced his opposition to our 900, and 1200 hour long course programs. He said, that accreditation for that length of program would face a very difficult time passing ACCET's accreditation process.

Cur school teaches not just the basics, but rather a complete program of (6 months) 1200 hours at \$ 6200.00, and 75% HANDS ON, under direct instructor guidance. This enables the beginner to become a highly skilled long distance truck driver. For drivers with some previous experience, written, and hands on tests are given. This evaluation process credits the passing grades, and the training concentrates on any needed areas.

The success of our schools, is attributed to the fact that our instructors have done the maintenance, practical, and have the experience of all facets of the industry, from mechanical, dispatching, driving, teaching, etc. Through our own on-going operation in the separate trucking company.

The educational school system is not equipped to teach our unique course, the reason is the systems inability to incorporate the "hands on" training needed. The school systems, can not provide the body building stamina that must be conditioned into the students. This body building stamina, is equated to jet lag in travelers; and is a required subject answered in the Department of Transportation road test, Pre-Hire of driver requirements.

Our school trains it's students under direct instructor supervision to a 32 state area, during the last 400 hours of our 1200 hour course. The school systems, can not teach the proper handling of freight, the various types of commodities, or the procedures involved. Yet, the Department of Education, is indirectly controlling our standards, and regulating our schools, because without funding the students are obliged to attend public schools, where low interest loans can be obtained.

Our school can teach proper documentation which is essential to prevent claims levied against the student's (prospective) employer's carrier; for lost product; due to improperly signed delivery receipts. This can amount to substantial financial loss. Again, another "hands on" technique only our type of school can supply. One reason, employers demand 3 years work experience, employers can not afford substantial losses through paperwork errors. The school systems can not show students the pro-

cedures, for the proper stacking on cargo, and weight distribution, to prevent overweight fines; or truck tip-overs due to cargo shift. The school systems can not provide proper telephone **communications** procedures, to prevent fines against (prospective) employer carriers, for late deliveries, or the communications/safety procedures, to prevent damage to equipment/cargo. The Federal Highway Administration is taking **comments** on industry training standards. It should be strongly advised that our industry is unique, and although standards must be set, the Department of Education is not qualified, directly, or indirectly. The Department of Public Safety, State of Minnesota, should be considered as a leader for being safety conscience. A separate government entity must be recognized to regulate the funding **for our industry**, TOTALLY detached from the Department of Education's control.

The school systems are not equipped to teach the techniques needed to handle a tractor-trailer on all types of roadways, and carrying various types of cargo. Students in familiar surroundings are not properly prepared to handle the stress related factors of being in various cities across the nation. The educational system has not dealt with the transportation industry, and it does not know the pitfalls, or the industry requirements/standards in order to adequately prepare, and teach the industry techniques.

Our school programs were developed by the actual doing of the duties required. The proccrams weren't developed by personnel who never did mechanical work, never cared for temperature sensitive cargo, never handled hazardous cargo. Our personnel developed the programs, from actual shipments, and involvements with the shipping public, not from reading requirements from a study manual. We built our school, reputation, and experience, from the building of our own truck line, training our own employees, and establishing a separate training school; based on the experiences we encountered over the past 40 years.

The federally mandated commercial driver's license, is only a slight improvement to an already flawed system. After a few hours of instruction, most students can pass the driving test, with an unloaded trailer, hooked to the semi tractor, in a CONTROLLED circumstance, such as that of a road test. That same individual in a job situation, near the end of an **exhaustive** trip in perhaps a crowded Washington, D.C. traffic setting, driving on ice/snow covered roadway is another. This driver is not only unskilled for the circumstances described, but being new to the industry, has probably not had prior experience driving in this locality.

Yet, Knowing this, the educational system refuses to acknowledge our school's expertise. Their response is NO help for our students. The 18 year old high school age student, who needs actual hands on training: this individual is handicapped, because he/she does not possess prior experience. A prospective employer will not invest the money training this individual because the cost are too high. This individual is further handicapped because of age. He/she would only be able to driver intrastate, until at which time they are 21 years of age, to be able to drive interstate. No student will enter the industry with such barriers to face, in addition to the inability to obtain student financial aid.

The 25- and beyond, age group, is handicapped, because they are head of households. They can not afford to support a family, work part-time, at a low paying job, while trying to return to school, without any student financial aid. It is small wonder there is such a gross shortage in our field.

Please bear in mind, that as a proprietary school, we do not have the luxury of tax exempt license plates. We pay upwards of \$ 3000.00 per year, per truck, for license, fuel, and other operating permits, highway use tax, in addition to the 41¢ per gallon fuel taxes we also pay. The Department of Education will NOT change it's policies, accreditation by way of the seven agencies **involves** application fees,

application processing fees, workshop fees, on-site examination fees, program processing fees, title IV assurance fees, sustaining fees, etc.

Cur school is continually told, in order to obtain **funding** for our students we must be accredited. **Our** school can not pay the \$ 14,000.00PLUS dues towards the accrediting bodies, who it appear did not do their job as well as could be expected. My estimation, that by increasing student tuition TRIPLE the amount, accreditation would become a reality through one the agencies under investigation for student financial aid abuses. The only student benefit, would be to secure a student loan to get an education. The student could ill afford to pay back that **loan**, not taking into account his cost of living expenses. We are at a position, in this country where we can no longer charge higher tuition, while delivering less in the form of education.

Our school has been trying to become accredited, (conforming to standards of pigeonholed variety), since 1990, (contacting several accrediting agencies), **additionally** of the seven independent, only three, could accredit our training school. We have contacted Senators, and Representatives, (statewide), explaining the problems our school, and other schools have trying to become accredited. In order for a school such as ours, in the transportation industry, to fit with the Department of Educations rulings, legislation must be past, to change the accrediting process. The seven agencies, that did not do the job entrusted to them, should have ~~the~~ privilege revoked. Other accrediting agencies are STATE agencies, these are non-profit agencies, with fees of minimum amounts, (Minnesota's, for example: North Central, charges \$ 350.00). The problem, our State agency can ONLY accredit a school that offers more than one course of study; therefore, our school was not eligible to apply for accreditation through this state agency. Forcing us, in a position to use the independent accrediting agencies. Again, I reiterate, our industry must have a separate independent means of standards/requirements, and funding from those indirectly under the control of the Department of Education.

Our school contacted contiguous state representatives also, informing them of the problems with the Department of Education's accrediting process. Prospective students from these states, and prospective employers, hearing of our school's training reputation, contact us, (either for the training, or for the trained graduates). The problem, the students can't get the funding to help them finance their schooling, without trained personnel, these employers are left with unfilled positions.

We didn't stop with just the contiguous states, we contacted over 400 Senators, and Representatives, sending PACKETS, of information describing the problems, and requesting help in the consideration of passing legislation. The response was positive, but WITHOUT PUBLIC AWARENESS, there is nothing they would do to correct the situation. The representatives are willing to allow the flawed system to continue, in light of the Senate investigation, (costing taxpayers Millions of dollars): because there is not enough public outcry to change the system. Meanwhile, the students will continue to pay escalating tuition cost, with taxpayers, and employers paying] for inadequate educational programs, and/or training programs.

Cur school spoke at length, about our school's problems with accreditation, as the standards pertain to our school, with Dr. Karen Kershenstein, state liaison, U.S. Department of Education, and with Mr. Roger Williams of Accrediting Commission for Continuing Education and Training. It was with utter DISBELIEF that I listened to Mr. Williams, in great detail; as to his opposition to our 900 and 1200 hour long course programs. Mr. Williams said, that accreditation for that length of program would face a very difficult time. The Department of Education, U.S., will not change their policies, regardless of the statements made by the U.S. Secretary of Education

Richard Riley. In "Goals 2000: Educate America", Mr. Riley says, "Achievement will take no less than total reform of our entire education system, from preschool through jobs training".

Secretary of Labor, Robert Reich feels, "Variation, and Diversity are not the enemies of high quality education. The enemy is rigid insistence on a factory model of schooling, a prescription for failure that refuses to accommodate diversity". Likewise, in the Secretary's Commission on Achieving Necessary Skills, Mr. Reich says, "more than half of our young people leave school without the knowledge or foundation required to find, and hold a good job".

Mr. Roger Williams, A.C.C.E.T. questions employee turnover in the transportation industry. My response to him was, "no training, or poorly trained people, in ALL phases of the job market create an unstable situation". The Department of Labor's study show 47% of new jobs created in the transportation industry, will be in truck driving. With these kinds of demands only a radical change in old customs will move our country successfully into the next century.

Our school is not ahead of it's time, the old unsuccessful teaching methods; are just showing how far behind they really are.

The focus should be upon the educational systems demanding SEVERAL factors: minimum programs with "hands on" training under the guidance of a veteran driver instructor. this statement should NOT be misconstrued by the assumption that every veteran driver can be, or is of instructor constitution. The good driver to become an instructor takes training in addition to time. Separate industry standards/regulations and lastly, some form of student financial aid, also separate from the indirect control of the Department of Educations rulings.

I base these conclusions from my personal, professional, business, and educational experiences. I have driven the 18 wheel heavy duty rigs for over 45 years, on a continuous basis. 1993, is the 40th anniversary of my own trucking company, which began in 1953. In addition to my experience in the transportation field, I have had the pleasure to be associated very closely in the educational field. I have drawn on my mechanical aptitude, and some accomplishments, to help evaluate post-secondary schools, in the State of Minnesota.

- * Present, and Past Program Evaluator, in the diesel mechanics course, for the State of Minnesota, in post-secondary education 15 years
- * Department of Education, truck driver instructor license, in post-secondary education
- * State of Minnesota, Department of Public Safety, instructor license for truck driver training
- * Minnesota State Highway Patrol, vehicle safety inspector license number 90111-I
- * Licensed for Freon Recovery & Recycling
- * Certificate for Brake & Air Dryer Inspection, maintenance & repair, Chicago-Rawhide Co., of Elgin, Ill.
- * Certificate of selection, application, and trouble detection, for oil seals, issued by the Chicago-Rawhide Co.
- * Albert Lea Quality Control Council - member

* Past Chairman of the Board of diesel mechanics - for the Albert Lea Technical College

* Present Advisory Board (Albert Lea/Mankato Technical College) member 15 yr.

Many seem to encourage business to become more active in their local school programs, hoping that by becoming involved maybe change in some attitudes about vocational education will be brought about. By my credentials listed, I am VERY involved in the vocational education system, on one hand, and a business, and training school, on the other. Involvement, has NOT changed the system, and WILL NOT change the system, until we in the transportation industry take charge of establishing our own unique training standards, and make the public aware of the absolute need for a separate form of funding for our future employees. The present accrediting process bars businesses from taking the initiative, and investing in training schools.

Sincerely;



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